[redacted]
09/21/2007 12:34 PM To
Jim Dilorenzo/R1/USEPA/US@EPA
cc
[redacted]
bcc

Subject
Wilmington/Olin Superfund Site - WERC Comments

Jim,

Attached below are comments on the Draft Interim Response Steps Work Plan
and Supplemental Materials for the referenced project.

Could you confirm receipt of the comments? Have a good weekend.

Gary Mercer
WERC Member

****
*
****

Draft Interim Response Steps Work Plan
Olin Chemical Superfund Site
Dated July 25, 2007

Comments

Overall:

1. My understanding is the site does not have an EPA approved QAPP. If
this is true, all data tables in the report should be footnoted to
indicate this. Also, all ongoing monitoring program will proceed with the
knowledge that all data collected under these programs will be evaluated
in the future to determine if the data will meet all QAPP requirements.
2. The approach in this report is to propose to reduce programs and do
less. At this early stage of the RI/FS process I cannot support
reductions in ongoing programs. Also, in general, little information is
provided to support these conclusions.

Slurry Wall/Cap – Monitoring of groundwater and surface water in the area
surrounding the slurry wall and inspection of the temporary cap

1. The statement that the slurry wall/cap fully contains the on-property
DAPL is not supported with any data or analysis. The only information
provided is in regards to the internal water table, which indicates

leakage through the cap and in turn, creates outflow from the slurry wall through the gravel window. Any statements on the effectiveness of the slurry wall/cap are probably premature at this time.

2. There should not be a reduction in the monitoring program of the wall/cap at this time. The effectiveness of the wall/cap system is not proven, detailed monitoring should continue until all parties agree on the effectiveness of the wall/cap system.

3. The past inspections reports should be provided to judge if the cap is adequately maintained. The information that outflow occurs from the system indicates that leakage is occurring through the cap. Though the gravel window in the slurry wall allows outflow and prevents higher internal pressures, the window should be only a backup to the cap.

4. The parameters that are monitored should be expanded to include some of the organic compounds, not just sampling for the inorganics that indicate a DAPL. The organics on the site carry the higher risk and should be sampled. The presumption that the organics in the DAPL follow the inorganics may not always be true.

5. An enhanced monitoring program should be implemented, either as part of the slurry wall/cap monitoring or as part of the pilot work for the off-site DAPL extraction, to monitor the effectiveness of the slurry wall while the pilot work is ongoing. The removal of the DAPL will create a pressure differential from the internal and external the slurry wall. Migration of the DAPL inside of the slurry could occur at that time.

Plant B – Operation, maintenance, and monitoring of the groundwater recovery/treatment system that was designed to remove and control migration of light non-aqueous phase liquid (LNAPL).

1. My understanding is the Plant B was constructed and operated to contain a release of LNAPL that occurred in the early 1980s. The stated outcomes for the shutdown (page 3-3) are:

a. No LNAPL migration or associated LNAPL sheen migration to the East Ditch, and

b. No observed impact to surface water receptors within the East Ditch from dissolved phase constituents in groundwater.

I strongly disagree with these objectives. Plant B has been preventing the migration of dissolved constituents as well as recovering LNAPL. I agree with the change in operation of Plant B to enhance recovery of LNAPL, but I do not support shutting down Plant B. It remains critical to contain the dissolved constituents and prevent their further migration.

2. The acceptable operation should not be no observable sheen; rather sampling of the East Ditch should be compared to the State’s Water Quality Standards to determine if shut down of Plant B is warranted.

3. Please remove the following statement in the second paragraph on page

3-3. There are no current or expected future users of this groundwater in this industrialized area and the primary receptor of this groundwater is adjacent East Ditch surface water. The RI/FS process will determine that.

4. Graphs (3-7 through 3-9) can be improved to provide more insight into the responses from Plant B. Trend lines of individual wells should be added which indicate if reductions in concentrations have occurred. The scatter of all data makes in difficult to pull out individual wells. Also, plotting concentrations on a semi-log plot flattens the y-axis, it would be benefical to plot them on normal axises

Dense Aqueous Phase Liquid (DAPL) Extraction Pilot Test in the OPWD Area – Continue design efforts and provide a schedule for the submittal to USEPA of the DAPL Extraction Pilot Test Design Report.

1. Figure 4-1. The thicker green line indicates DAPL. In the text, please explain how that boundary was determined or estimated? The thicker black line is the OPWD Study Area. Again in the text, please explain how that boundary was determined. Also, note that black line crosses the green line on the westerly side. Please explain? Also, there is a thicker green line on the northwest corner of the figure. What does this indicate? Lastly, is this all the OPWD DAPL or are there other DAPL locations?

2. I fully support the pilot testing but additional monitoring is needed in the DAPL to determine the effects farther away from the extraction wells. The ILW need to be near the extraction well to provide the information that the DAPL is not mixing with overlaying groundwater. But wells should monitor the DAPL in the entire OPWD DAPL to assure that the extraction wells are not causing other unforeseen problems.

3. Examine ways to expedite the schedule. 16 months to final design appears overly long for this project.

4. Considerations to alternatives to rail cars for removal of DAPL should be made. Approval from railroads to rehabilitate and use rail lines may further lengthen schedule. Discussion with railroad should start immediately.